

**EXHIBIT U TO
CISNEROS DECLARATION
REDACTED VERSION**

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 IN RE: HIGH-TECH EMPLOYEE)
6 ANTITRUST LITIGATION)
7) No. 11-CV-2509-LHK
8 THIS DOCUMENT RELATES TO:)
9 ALL ACTIONS.)

10 _____

11
12 VIDEO DEPOSITION OF LASZLO BOCK
13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
14 March 27, 2013

15
16 Reported by: Anne Torreano, CSR No. 10520
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21
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10:54:13 1 who contacted you?

10:54:14 2 A. I do.

10:54:14 3 Q. What is it?

10:54:15 4 A. Egon Zender.

10:54:16 5 Q. And who did you interview with at Google?

10:54:22 6 A. I don't remember everyone I interviewed with,

10:54:26 7 but the list included Alan Eustace, Omid Kordestani,

10:54:33 8 Shona Brown, Jonathan Rosenberg, George Reyes. Oh, and

10:54:46 9 members of what would eventually be my staff. So Stacy

10:54:49 10 Sullivan, Judy Gilbert, Arnon Geshuri, Liane Hornsey,

10:54:55 11 which was a phone interview, Sue Wuthrich.

10:55:00 12 There were others. I don't recall who they

10:55:01 13 were.

10:55:01 14 Q. Okay. I'd like to ask you some questions

10:55:26 15 about Google's compensation system.

10:55:29 16 A. Okay.

10:55:33 17 THE WITNESS: Could I grab a little water?

10:55:35 18 MS. SHAVER: Sure.

10:55:35 19 Why don't we go off the record for a few

10:55:37 20 minutes?

10:55:37 21 THE WITNESS: Is that -- I just -- okay.

10:55:40 22 Thanks.

10:55:40 23 THE VIDEOGRAPHER: We're off the record at

10:55:41 24 10:54.

10:56:43 25 (RECESS TAKEN.)

11:04:25 1 THE VIDEOGRAPHER: We're back on the record at

11:04:52 2 11:03.

11:04:54 3 BY MS. SHAVER:

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11:05:09 8 Q. And do you recall approximately when that

11:05:11 9 happened?

11:05:11 10 A. I don't. It was sort of mid to lateish 2000s,

11:05:15 11 but I don't recall specifically when.

11:05:16 12 Q. Okay. And do you remember -- were you

11:05:18 13 involved in that decision?

11:05:20 14 A. Yes.

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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11:08:38 23 A. I don't remember this one specifically, but it

11:08:41 24 says it's from me, so I believe it's from me.

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11:10:26 1 Q. Okay. Thanks.

11:10:36 2 A. Oh, but one other thing. It may not be from
11:10:39 3 me because it says, "Let me or Laszlo know if you have
11:10:43 4 any further questions" on the bottom, so the "From" is
11:10:46 5 a little confusing to me, but ...

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

11:11:33 14 A. No, that's not correct.

11:11:34 15 MR. RUBIN: Objection.

11:11:35 16 Give me one second.

11:11:37 17 THE WITNESS: Oh, sorry.

11:11:37 18 MR. RUBIN: Objection. Form.

11:11:39 19 THE WITNESS: No.

11:11:40 20 MR. RUBIN: Now you can answer.

11:11:41 21 THE WITNESS: That is not correct.

11:11:43 22 BY MS. SHAVER:

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

11:11:54 1 MR. RUBIN: Objection. Form.

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

11:12:04 5 BY MS. SHAVER:

11:12:04 6 [REDACTED]

11:12:09 7 MR. RUBIN: Objection. Form.

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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11:14:19 2

MR. RUBIN: Objection. Form.

11:14:51 11

BY MS. SHAVER:

11:15:53 24

MR. RUBIN: Objection. Form.

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MR. RUBIN: Objection. Form.

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11:23:21 1 where everybody else's is.

11:23:24 2 At Google what we do, which is a little

11:23:26 3 different -- so to be more precise, [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11:23:51 9 MS. SHAVER: I'd like to mark this as the next

11:23:53 10 exhibit.

11:23:53 11 (DEPOSITION EXHIBIT 2419 MARKED.)

11:24:02 12 BY MS. SHAVER:

11:24:02 13 Q. This document is Bates-stamped

11:24:05 14 GOOG-HIGH-TECH-195260.

11:24:10 15 Mr. Bock, do you recognize this document?

11:24:12 16 A. Let me just look at it.

11:24:36 17 Okay.

11:24:36 18 Q. Do you recognize this document?

11:24:37 19 A. I do.

11:24:38 20 Q. What is it?

11:24:39 21 A. It's a correspondence between Eric and me that

11:24:45 22 I then forwarded to the folks on the benefits and

11:24:51 23 compensation teams.

11:24:51 24 Q. And in the first e-mail from Eric Schmidt,

11:24:57 25 he's -- he asks you to do another survey of benefits in

11:47:29 1 no impact at all.

11:47:29 2 In a handful of cases, some people talked
11:47:31 3 about it and heard about it, and a few Googlers, you
11:47:34 4 know, didn't like that, but it had no real impact.

11:48:17 5 BY MS. SHAVER:

11:48:17 6 Q. I believe you testified earlier that while
11:48:19 7 individual managers at Google may be concerned with pay
11:48:22 8 fairness on their team, that wasn't the overall
11:48:24 9 perspective of the company.

11:48:26 10 Is that a fair characterization of what you
11:48:28 11 said?

11:48:28 12 A. Roughly, yeah.

11:48:29 13 Q. Okay. Does this e-mail from Sergey Brin, one
11:48:31 14 of the founders of the company, specifically inquiring
11:48:33 15 about internal equity change your testimony at all?

11:48:36 16 MR. RUBIN: Objection. Form.

11:48:37 17 THE WITNESS: No. I don't know why it would.

11:48:43 18 The -- I mean, one thing to understand here,
11:48:45 19 too, is that as we develop these programs, there was
11:48:49 20 some people who thought it would be a good idea and
11:48:51 21 some people thought it would be a bad idea. Sergey
11:48:54 22 here is asking a question about, you know, why are we
11:48:56 23 doing this and what is the advantage to it?

11:48:58 24

[REDACTED] 11:49:25 3

[REDACTED] BY MS. SHAVER:

[REDACTED] 11:49:55 6

[REDACTED] MS. SHAVER: Can I have 39?

[REDACTED] 11:50:10 7

[REDACTED] Please mark this as the next exhibit.

[REDACTED] 11:50:11 8

[REDACTED] (DEPOSITION EXHIBIT 2422 MARKED.)

[REDACTED] 11:50:20 9

[REDACTED] BY MS. SHAVER:

[REDACTED] 11:50:20 10

[REDACTED] Q. This document is Bates-stamped

[REDACTED] 11:50:25 11

[REDACTED] GOOG-HIGH-TECH-328300.

[REDACTED] 11:50:29 12

[REDACTED] Mr. Bock, do you recognize this document?

[REDACTED] 11:50:36 13

[REDACTED] A. I don't remember it, but, you know, it's an

[REDACTED] 11:50:44 14

[REDACTED] e-mail that I'm on.

[REDACTED] 11:50:46 15

[REDACTED] Q. Okay. If you look at the chart that's on page

[REDACTED] 11:50:59 16

[REDACTED] 1, can you explain to me what this chart reflects?

[REDACTED] 11:51:03 17

[REDACTED] A. Yeah, let me look at this more broadly and see

[REDACTED] 11:51:08 18

[REDACTED] what this is.

[REDACTED] 11:51:16 19

[REDACTED] Okay. Sorry. Your question again? I

[REDACTED] 11:51:54 20

[REDACTED] apologize.

[REDACTED] 11:51:54 21

[REDACTED] Q. The question was about what the chart

[REDACTED] 11:51:58 22

[REDACTED] reflects.

[REDACTED] 11:51:59 23

[REDACTED] A. [REDACTED]

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11:58:18 1 A. No, no, no. I wrote, how do we address
11:58:20 2 Sheryl's concern it sends a bad message? I didn't say
11:58:23 3 anything about whether I agree or what I think. That's
11:58:25 4 what Sheryl said.

11:58:26 5 If -- you should ask Sheryl. I don't know
11:58:28 6 what she meant.

11:58:29 7 Q. Yeah, my question is a little bit different.
11:58:32 8 It's not what she meant. It's the words you chose to
11:58:35 9 use in your e-mail.

11:58:36 10 MR. RUBIN: Objection. Well, objection. No
11:58:38 11 question. So to form, to the extent there's not a
11:58:42 12 question.

11:58:42 13 BY MS. SHAVER:

11:58:42 14 Q. Did you do anything to address Sheryl's
11:58:44 15 concern?

11:58:45 16 A. I asked Allan and Jon for context.

11:58:51 17 Q. And was there any outcome to that discussion?
11:58:54 18 Did you end up addressing it in any way?

11:58:56 19 A. I don't recall, but I don't think we did. I
11:58:58 20 don't recall specifically, but I don't think we did.

11:59:00 21 Allan's right. I mean, I want to be precise.
11:59:09 22 I'm confident we didn't make any substantial changes as
11:59:12 23 a result of that request.

11:59:15 24 MS. SHAVER: Can I have 41, please?

11:59:51 25 Actually, hold off.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12:05:34 17 MS. SHAVER: Let's take a break.

12:05:35 18 THE VIDEOGRAPHER: We're going off record at

12:05:40 19 12:04.

12:05:43 20 (RECESS TAKEN.)

12:25:57 21 THE VIDEOGRAPHER: We're back on the record at

12:26:24 22 12:25. This is the beginning of video No. 2.

12:26:35 23 MS. SHAVER: I'd like to mark the next

12:26:38 24 exhibit, please.

12:26:39 25 (DEPOSITION EXHIBIT 2423 MARKED.)

12:26:48 1 BY MS. SHAVER:

12:26:48 2 Q. This exhibit is Bates-stamped

12:26:51 3 GOOG-HIGH-TECH-210276.

12:26:56 4 Mr. Bock, do you recognize this document?

12:26:57 5 A. It's an e-mail that I'm on.

12:27:01 6 Q. Okay. If you'll look in the middle of the

12:27:05 7 page, it's an e-mail sent from you to Kent Walker,

12:27:10 8 David Drummond, Laszlo Bock, Shona Brown, Becky Bucich

12:27:13 9 on June 26th, 2008.

12:27:16 10 Do you see that?

12:27:16 11 A. Mm-hmm.

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10 of 10

A. Okay. Good.

MS. SHAVER: I'd like to introduce the next

exhibit, please.

(DEPOSITION EXHIBIT 2425 MARKED.)

MR. RUBIN: Just to be clear, you weren't

suggesting I -- I didn't interpret it that way, but

just so it's clear in the transcript, you weren't

suggesting I didn't produce them before. You just have

it today?

MS. SHAVER: That's correct, yeah.

THE WITNESS: You're not going to make me read

this whole thing; right?

MS. SHAVER: I'm not.

THE WITNESS: Okay.

BY MS. SHAVER:

☐ ☐

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(DEPOSITION EXHIBIT 2426 MARKED.)

12:43:13 1 finalizing."

12:43:13 2 Do you see that?

12:43:14 3 A. I do.

12:43:14 4 Q. Does this refresh your recollection that you
12:43:16 5 did share compensation and salary budget information
12:43:21 6 with competitors?

12:43:22 7 MR. RUBIN: Objection. Form.

12:43:24 8 THE WITNESS: It doesn't change my perspective
12:43:27 9 at all. As I said, I have not shared any information
12:43:29 10 of this kind with other companies.

12:43:32 11 BY MS. SHAVER:

12:43:32 12 Q. Has Google shared that information, to your
12:43:34 13 knowledge?

12:43:35 14 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12:43:51 20 And in fact, since our number wasn't

12:43:54 21 determined, it would be hard -- and the point of the
12:43:56 22 e-mail is to discuss what it should be, I'm not sure we
12:44:00 23 would have anything to share.

12:44:01 24 The other point I'd make is that the companies
12:44:05 25 run different cycles and the timing is different. So

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REPORTER'S CERTIFICATE

I, Anne Torreano, Certified Shorthand Reporter licensed in the State of California, License No. 10520, hereby certify that the deponent was by me first duly sworn, and the foregoing testimony was reported by me and was thereafter transcribed with computer-aided transcription; that the foregoing is a full, complete, and true record of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named or in any way interested in the outcome of the cause in said caption.

The dismantling, unsealing, or unbinding of the original transcript will render the reporter's certificates null and void.

In witness whereof, I have subscribed my name this 9th day of April, 2013.

☐ Reading and Signing was requested.

☐ Reading and Signing was waived.

☒ Reading and Signing was not requested.


ANNE M. TORREANO, CSR No. 10520

**CORRECTIONS TO DEPOSITION TRANSCRIPT OF
LASZLO BOCK, DATED MARCH 27, 2013**
In re High-Tech Employee Antitrust Litigation
Case No. 11-CV-2509-LHK (N.D. Cal.)


Page:Line	Amendment	Reason for Amendment
22:20	Replace: "Degan" With: "Deegan"	correction to transcript error
27:11-12	Replace: "Stacy and" With: "Stacy who"	correction and clarification
29:7	Replace: "Degan" With: "Deegan"	correction to transcript error
34:25	Replace: "executive office" With: "executive offers"	correction and clarification
36:5	Replace: "recollection on" With: "recollecting"	correction to transcript error
50:10	Replaced: "comp-out comps" With: "comp outcomes"	correction to transcript error
65:5	Replace: "contemporaneous" With: "contemporaneously"	correction to transcript error
71:2	Delete "So yeah"	correction and clarification
75:1	Replace: "Alan" With: "Allan"	correction to transcript error
75:10	Replace: "manager" With: "major"	correction to transcript error
75:16	Replace: "are" With: "have"	correction and clarification
88:23	Replace: "what guidelines"	correction and clarification

Page:Line	Amendment	Reason for Amendment
	With: "the guidelines"	
111:8	Replace: "on the press" With: "in the press"	correction to transcript error
111:9-10	Replace: "what else would they look at." With: "what else would they look at?"	correction to transcript error
141:10	Replace: "has not" With: "doesn't have"	correction and clarification
148:5	Replace: "get" With: "got"	correction to transcript error
156:20	Insert "more" after "Certainly"	correction and clarification

Subject to the above changes, I certify that the transcript is true and correct.



 Signature



 Date